

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
1:24-CV-00017-LCB-JLW**

JOHN DOE 1, a minor, by and through his parent and natural guardian JANE DOE 1; JOHN DOE 2, a minor, by and through his parent and natural guardian JANE DOE 2; JOHN DOE 3, a minor, by and through his parent and natural guardian JANE DOE 3; on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

NORTH CAROLINA DEPARTMENT OF PUBLIC SAFETY; EDDIE M. BUFFALOE, JR., Secretary of the North Carolina Department of Public Safety, in his official capacity; WILLIAM L. LASSITER, Deputy Secretary of the Division of Juvenile Justice and Delinquency Prevention, in his official capacity; PETER BROWN, Facility Director of the Cabarrus Regional Juvenile Detention Center, in his official capacity,

Defendants.

**NOTICE OF WITHDRAWAL
OF MOTION TO COMPEL
THIRD PARTY DISABILITY
RIGHTS NORTH CAROLINA
TO PRODUCE DOCUMENTS**

Plaintiffs John Doe 1 and John Doe 2 (“Plaintiffs”), on behalf of themselves and others similarly situated, give notice that they hereby withdraw their Motion to Compel Third Party Disability Rights North Carolina to Produce Documents [ECF No. 48] (“Motion to Compel”). Plaintiffs further give notice that they will pursue judicial

enforcement of the subpoena served upon Disability Rights North Carolina (the “Subpoena”) at issue in their Motion to Compel in the United States District Court for the Eastern District of North Carolina, if necessary. Plaintiffs expressly reserve all rights regarding the Subpoena and the relief sought in their Motion to Compel.

[SIGNATURE PAGE FOLLOWS]

This the 8th day of January, 2025.

**NELSON MULLINS RILEY &
SCARBOROUGH LLP**

/s/Robert L. Lindholm

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Counsel for Plaintiffs

**Special Appearance Pursuant to Local Civil Rule 83.1(d)*

***Motion for Special Appearance Pursuant to Local Civil Rule 83.1(d) Forthcoming*

COUNCIL FOR CHILDREN'S RIGHTS

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CERTIFICATE OF SERVICE

I hereby certify that, on January 8, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

Dated: January 8, 2025

/s/ Robert L. Lindholm
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